

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
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Interference Immunity Performance)	ET Docket No. 03-65
Specifications for Radio Receivers)	
)	
Review of the Commission's Rules and)	MM Docket No. 00-39
Policies Affecting the Conversion to Digital)	
Television)	
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COMMENTS OF THE ADVANCED TELEVISION SYSTEMS COMMITTEE, INC.

The Advanced Television Systems Committee, Inc. hereby submits these comments on the Commission's Notice of Inquiry in the proceeding noted above dealing with the Commission's consideration of interference immunity performance specifications for receivers. The ATSC has approximately 140 member organizations representing the broadcast, broadcast equipment, motion picture, cable, computer, satellite, consumer electronics, and semiconductor industries. The ATSC developed the ATSC Digital Television Standard, most of which the Commission adopted as its DTV broadcast standard in 1996. The ATSC's comments on the Notice of Inquiry are limited to paragraphs 34-36 in which the Commission seeks comment on the development of voluntary receiver performance standards for broadcast DTV receivers.

We commend the Commission for its call to industry to develop voluntary specifications. We believe that the ATSC's broad membership and experience in the development of DTV standards and Recommended Practices make it the appropriate organization to take on this important cross-industry work. The ATSC has in fact already started work on the development of a Recommended Practice for DTV receiver performance.


A Recommended Practice is a document that states specifications that are thought to be advisable. Recommended Practices augment Standards, and typically provide guidelines for operation and performance. Under ATSC Bylaws, development and adoption of a Recommended Practice follows the same consensus-driven development process and voting requirements for adoption as that of a Standard. In addition to its technical standards work, the ATSC has adopted a variety of such recommended practices in the DTV field. We believe that a Recommended Practice will provide the consumer electronics industry with important guidelines for appropriate and relevant performance parameters for DTV receivers while providing the necessary flexibility for product innovation.


Our Specialist Group on Receivers (T3/S10) has started its work to develop the Recommended Practice for DTV Receiver Performance, with broad support and participation from the affected industries. The ATSC press release announcing this activity is included with these Comments as Attachment 1. Thus, the ATSC has already achieved the Commission's goal of convening an industry group within a three month period and we hope to meet the six to nine month development target suggested by the Commission (see FCC NOI paragraph 36). The complex nature of this work includes detailed analysis of various trade-offs in receiver design, making it difficult to guarantee a completion date. However, we expect to have a draft completed by early 2004.

In summary, the ATSC is responding positively to the Commission's request for an industry effort to develop voluntary DTV receiver performance guidelines. We believe that the ATSC is the appropriate organization for this important effort and we will strive to complete the work in a timely manner.

Respectfully submitted,

The Advanced Television Systems Committee


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Advanced Television Systems Committee

FOR IMMEDIATE RELEASE

ATSC TO DEVELOP RECOMMENDED PRACTICE FOR DTV RECEIVERS

New Document will Provide Guidelines for Receiver Manufacturers

WASHINGTON, D.C., June 30, 2003 – The [Advanced Television Systems Committee, Inc. \(ATSC\)](#) is in the process of developing a Recommended Practice that will establish voluntary guidelines for broadcast digital television (DTV) receiver performance.

“Our decision to develop a Recommended Practice reflects our goal of providing the consumer electronics industry with important information while providing manufacturers with the necessary flexibility for product innovation,” said Mark Richer, President of ATSC. “We also want to be responsive to a recent Federal Communications Commission (FCC) Notice of Inquiry (in ET Docket 03-65) which suggests that the industry develop voluntary DTV receiver performance guidelines.”

Development of the new Recommended Practice is underway in the ATSC Specialist Group on Receivers (T3/S10). “Recommended Practices” are a widely accepted tool in the television industry that augment Standards, and typically provide support and tutelage in the development of activities, operations, and equipment. In addition to its technical standards work, the ATSC has adopted a variety of such recommended practices for different industry segments in the DTV field.

The Advanced Television Systems Committee, Inc. is an international, non-profit organization developing voluntary standards for digital television. The ATSC [member organizations](#) represent the broadcast, broadcast equipment, motion picture, consumer electronics, computer, cable, satellite, and semiconductor industries.

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